

Nell Brown
Assistant Federal Public Defender
101 SW Main Street, Suite 1700
Portland, Oregon 97204
Tel: (503) 326-2123
Fax: (503) 326-5524
Email: nell_brown@fd.org

Attorney for Petitioner

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

FRANK E. GABLE

Petitioner,

v.

MAX WILLIAMS,

Respondent.

Case No. 3:07-cv-00413-AC

**DECLARATION OF
COUNSEL IN SUPPORT OF
UNOPPOSED MOTION TO
MODIFY SCHEDULE**

I, Nell Brown, declare:

1. I am the attorney of record in this case.
2. On May 15, 2019, the Respondent filed its Motion for Stay and supporting memorandum. CR 171. On May 16, 2019, the Court set the following schedule: Petitioner's response is due on June 5, 2019. Respondent's reply is due on June 24, 2019. Oral argument is scheduled for July 9, 2019, at 9:30 a.m. Modification of this schedule is requested because undersigned counsel has long planned to be outside the District of Oregon in July.
3. Assistant Attorneys General Samuel Kubernick and Nicholas Kallstrom, counsel for Respondent, have advised that the Respondent has no objection to the proposed revised schedule.
4. This motion is made in good faith and not for the purposes of delay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information and belief.

Respectfully submitted on May 21, 2019.

/s/ Nell Brown

Nell Brown, Assistant Federal Public Defender
Attorney for Petitioner